

Patterson, P.

UNITED STATES DISTRICT OF NEW YORK
SOUTHERN DISTRICT OF NEW YORK----- X
ANU ALLEN,

Plaintiff,

-against-

CHANEL, INC.,

Defendant.
----- X

ECF CASE

12-cv-06758-RPP-DCF

STIPULATION

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 8/28/14
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The parties, by and through their respective counsel, hereby agree and stipulate as follows:

1. Plaintiff Anu Allen ("Plaintiff" or "Allen") represents and agrees that she shall not seek from Defendant Chanel, Inc. ("Defendant" or "Chanel"), or Defendant's affiliates and/or related entities and each of their respective employees, consultants or agents, and is precluded from seeking, any damages for emotional distress pursuant to her claims in this action, and Plaintiff hereby withdraws with prejudice any and all claims for compensatory or other damages as they relate to emotional pain and suffering.

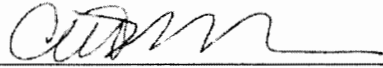
2. Plaintiff represents and agrees that she will proffer no evidence or testimony from any healthcare provider and/or from any expert relating to her alleged emotional distress damages in support of or in opposition to any motion and/or at any trial in this action.

3. Plaintiff represents and agrees that she will proffer no evidence, including her own testimony, or the testimony of other non-medical providers or non-expert witnesses, such as family members, co-workers and/or friends, related to damages for emotional distress in support of or in opposition to any motion and/or at any trial in this action.

4. In reliance upon Plaintiff's representations and agreements herein, Defendant shall not request, and will not move to compel, an independent mental examination of Plaintiff or

the production of Plaintiff's medical records, absent a showing of exceptional circumstances pursuant to applicable law.

LAW OFFICES OF
CHRISTOPHER THOMPSON, ESQ.

By 

Christopher Thompson
33 Davison Lane East
West Islip, New York 11795
(631) 983-8830
(631) 983-8831 (fax)

Attorney for Plaintiff
Anu Allen

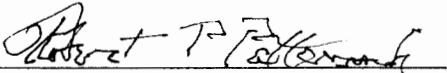
SEYFARTH SHAW LLP

By 

Lorie E. Almon
Caitlin S. Ladd
620 Eighth Avenue, 32nd Floor
New York, New York 10018
(212) 218-5500
(212) 218-5526 (fax)

Attorneys for Defendant
Chanel, Inc.

SO ORDERED:



HON. ROBERT P. PATTERSON *xm*

8/27/14